



*Bankruptcy Code (Additional Technical Modifications)* [Docket No. 1609] (as amended and supplemented, the “Plan”). Unless otherwise defined in this notice, capitalized terms used in this notice shall have the same meanings as the capitalized terms of the Plan and Confirmation Order, as applicable.

**PLEASE TAKE FURTHER NOTICE** that the effective date of the Plan occurred on October 24, 2023 [Docket No. 1788] (the “Effective Date”).

**PLEASE TAKE FURTHER NOTICE** that on July 22, 2024, the Plan Administrator filed the *Third Status Report to Creditors and Announcement of Planned 100% Distribution on Customer Claims* (the “Status Report”) [Docket No. 2357] notifying creditors of the sale of the FTX Claims and setting August 23, 2024 as the earliest date to commence the Final Customer Distribution.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Confirmation Order at ¶ 114, the Wind-Down Debtors hereby file this Notice of Disputed Claims Reserve<sup>2</sup> (the “Notice”), setting forth the amounts to be held in reserve pending the resolution of the Disputed Claims on Schedule 1 attached hereto.

**PLEASE TAKE FURTHER NOTICE** that objections to this Notice must be filed with the Court by August 16, 2024 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

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<sup>2</sup> “Disputed Claims Reserve” means an appropriate reserve in an amount to be determined by the Wind-Down Debtors for Distributions on account of Disputed Claims that are subsequently Allowed after the Effective Date. Plan, Art. I.A.108. “Disputed” means a Claim or an Interest or any portion thereof: (a) that is not Allowed; (b) that is not disallowed under the Plan, the Bankruptcy Code, or a Final Order; and (c) with respect to which a party in interest has Filed a Proof of Claim, a Proof of Interest, or otherwise made a written request to a Debtor for payment. Plan, Art. I.A.107.

**PLEASE TAKE FURTHER NOTICE** that failure to file an objection prior to the Objection Deadline will result in the establishment of the Disputed Claims Reserve at the amounts shown on Schedule 1 without further notice or hearing.

Dated: August 9, 2024

/s/ Daniel M. Stolz

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**Schedule 1**

<b>Claimant Name</b>	<b>Claim Number</b>	<b>Reserve Amount</b>	<b>Debtor Entity</b>
Chubb Insurance Company of New Jersey	14314	\$0	BlockFi Investment Products LLC
Chubb Insurance Company of New Jersey	13635	\$0	BlockFi Lending LLC
Chubb Insurance Company of New Jersey	14068	\$0	BlockFi Services, Inc.
Chubb Insurance Company of New Jersey	12945	\$0	BlockFi Inc.
Chubb Insurance Company of New Jersey	12942	\$0	BlockFi Trading LLC
Chubb Insurance Company of New Jersey	14312	\$0	BlockFi Wallet LLC
Chubb Insurance Company of New Jersey	14534	\$0	BlockFi International Ltd.
Chubb Insurance Company of New Jersey	14499	\$0	BlockFi Ventures LLC
Chubb Insurance Company of New Jersey	14920	\$0	BlockFi Lending II LLC
ACE American Insurance Company	13138	\$0	BlockFi Investment Products LLC
ACE American Insurance Company	13435	\$0	BlockFi Lending LLC
ACE American Insurance Company	13440	\$0	BlockFi Services, Inc.
ACE American Insurance Company	13591	\$0	BlockFi Inc.
ACE American Insurance Company	13592	\$0	BlockFi Trading LLC
ACE American Insurance Company	13605	\$0	BlockFi Wallet LLC
ACE American Insurance Company	13613	\$0	BlockFi International Ltd.
ACE American Insurance Company	14305	\$0	BlockFi Ventures LLC
ACE American Insurance Company	14306	\$0	BlockFi Lending II LLC
Illinois Union Insurance Company	14316	\$0	BlockFi Investment Products LLC
Illinois Union Insurance Company	14932	\$0	BlockFi Lending LLC
Illinois Union Insurance Company	14954	\$0	BlockFi Services, Inc.
Illinois Union Insurance Company	14480	\$0	BlockFi Inc.
Illinois Union Insurance Company	14315	\$0	BlockFi Trading LLC
Illinois Union Insurance Company	14940	\$0	BlockFi Wallet LLC
Illinois Union Insurance Company	13532	\$0	BlockFi International Ltd.
Illinois Union Insurance Company	14946	\$0	BlockFi Ventures LLC
Illinois Union Insurance Company	13432	\$0	BlockFi Lending II LLC
Westchester Surplus Lines Insurance Company	14711	\$0	BlockFi Investment Products LLC
Westchester Surplus Lines Insurance Company	14975	\$0	BlockFi Lending LLC
Westchester Surplus Lines Insurance Company	13844	\$0	BlockFi Services, Inc.

Claimant Name	Claim Number	Reserve Amount	Debtor Entity
Westchester Surplus Lines Insurance Company	14963	\$0	BlockFi Inc.
Westchester Surplus Lines Insurance Company	14972	\$0	BlockFi Trading LLC
Westchester Surplus Lines Insurance Company	14524	\$0	BlockFi Wallet LLC
Westchester Surplus Lines Insurance Company	14830	\$0	BlockFi International Ltd.
Westchester Surplus Lines Insurance Company	15099	\$0	BlockFi Ventures LLC
Westchester Surplus Lines Insurance Company	14295	\$0	BlockFi Lending II LLC
AIG Property Casualty, Inc.	26961	\$0	BlockFi Inc.
Swiss Re Corporate Solutions America Insurance Company f/k/a North American Specialty Insurance Company	25864	\$405,000	BlockFi Inc.
Swiss Re Corporate Solutions America Insurance Company f/k/a North American Specialty Insurance Company	25929	\$405,000	BlockFi Lending LLC
[REDACTED]	13639	N/A*	BlockFi Inc.
[REDACTED]	14172	N/A*	BlockFi Inc.
[REDACTED]	14288	N/A*	BlockFi Inc.
[REDACTED]	14296	N/A*	BlockFi Inc.
[REDACTED]	13560	N/A <sup>i</sup>	BlockFi Lending LLC
[REDACTED]	14733	N/A*	BlockFi Inc.
[REDACTED]	13747	N/A*	BlockFi Inc.
[REDACTED]	14102	N/A*	BlockFi Inc.
PA Department of Banking and Securities	2197	N/A*	BlockFi Lending LLC
D.C. Department of Insurance, Securities and Banking	30778	N/A*	BlockFi Lending LLC
D.C. Department of Insurance, Securities and Banking	31739	N/A*	BlockFi Inc.
Illinois Secretary of State	30928	N/A*	BlockFi Lending LLC
North Carolina Department of the Secretary of State	31560	N/A*	BlockFi Inc.
North Carolina Department of the Secretary of State	31570	N/A*	BlockFi Lending LLC
Alabama Securities Commission	31594	N/A*	BlockFi Lending LLC

Claimant Name	Claim Number	Reserve Amount	Debtor Entity
State of Hawaii, Department of Commerce and Consumer Affairs, Securities Enforcement Branch	31639	N/A*	BlockFi Inc.
State of Hawaii, Department of Commerce and Consumer Affairs, Securities Enforcement Branch	31640	N/A*	BlockFi Lending LLC
State of New York	31652	N/A*	BlockFi Lending LLC
Virginia State Corporation Commission	31734	N/A*	BlockFi Lending LLC
Indiana Secretary of State Securities Division	31745	N/A*	BlockFi Inc.
Indiana Secretary of State Securities Division	31764	N/A*	BlockFi Lending LLC
State of Connecticut Dept. of Banking, Securities and Business Investments Division	31747	N/A*	BlockFi Lending LLC
West Virginia State Auditor - Securities Commission	33432	N/A*	BlockFi Lending LLC
Ankura Trust Company, LLC	15892	\$560,066.25 <sup>ii</sup>	BlockFi Inc.
George Gerro	15248	\$0	BlockFi Lending
George Wynns	3052	\$26,152.78 <sup>iii</sup>	BlockFi Lending
John VanTubergen	7233	\$19.07	BlockFi Inc.
Chad Main	5647	\$11,335.33 <sup>iv</sup>	BlockFi Lending
Sergei Potapenko	15754	N/A <sup>v</sup>	BlockFi International
Sergei Potapenko	17531	N/A <sup>vi</sup>	BlockFi International

\* Claims denoted with an asterisk, to the extent they are determined to be valid, are classified as subordinated to customer claims for one or more of the debtor entities and therefore no reserve is being held as to these claims for the purposes of the Plan Administrator's Final Customer Distribution on non-subordinated claims.

<sup>i</sup> This claim is waived per the Plan but has not yet been objected to by the Plan Administrator.

<sup>ii</sup> The reserve for this claim is related to the Indenture Trustee's post-petition fees and expenses and does not supersede, modify, abrogate or in any way affect the rights of the Indenture Trustee under the Plan and Confirmation Order including, without limitation, ¶ 127 of the Confirmation Order.

<sup>iii</sup> The reserve for this claim the total Allowed claim amount after set-off of the creditor's outstanding loan balance.

<sup>iv</sup> The reserve for this claim the total Allowed claim amount after set-off of the creditor's outstanding loan balance.

<sup>v</sup> The reserve for this claim has been set pursuant to a stipulation with the Department of Justice (the "DOJ"). The inclusion of this claim on Schedule 1 is for informational purposes only. The Plan Administrator does not seek a ruling as to this claim or the reserve, and nothing contained herein shall be construed to have any effect on the adversary proceeding related to these claims or to the DOJ's rights therein.

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<sup>vi</sup> The reserve for this claim has been set pursuant to a stipulation with the DOJ. The inclusion of this claim on Schedule 1 is for informational purposes only. The Plan Administrator does not seek a ruling as to this claim or the reserve, and nothing contained herein shall be construed to have any effect on the adversary proceeding related to these claims or to the DOJ's rights therein.